

SCAQMD EXCAVATION PERMIT APPLICATION PLAN NARRATIVE

AND

CDHS SITE CLOSURE PLAN AMENDMENT

Submitted to:

South Coast Air Quality Monitoring District

and

California Department of Health Services

For:

Trent Tube Plant

2100 East Orangethorpe Avenue

Fullerton, California

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By:

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AQMD EXCAVATION PLAN NARRATIVE

General

This narrative is submitted to satisfy the combined requirements of the California Department of Health Services (CDHS) for facility closure and the excavation permit requirements of the South Coast Air Quality Monitoring District (SCAQMD). The original Closure Plan (PLAN) was submitted to the CDHS and SCAQMD on January 18 and 28, 1985, respectively. That PLAN should be referenced as the primary Closure and Excavation Plan. For purposes of brevity, this narrative should be reviewed as an Amendment to the PLAN.

Based on discussions with Mr. Thielking of CDHS and Mr. Pease of SCAQMD, we propose the methods of soil excavation, removal, treatment, monitoring and management as described below.

Soil Remediation and Quantities

Approximately 20 to 40 cubic yards (cy) of moderately 1,1,1-Trichloroethane (TCE) contaminated (2 to 780 ppm) soil in the vicinity of Boring D-2 (Figure 1A) will be removed from the site as presented in the original PLAN (Area 1 of Figure 8). This soil will be transported under manifest along with oil-stained surface soils in the vicinity of Boring E-2 to a Class-1 facility for disposal. Note that no vinyl chloride was used at the facility and none was detected in the organic scans of samples obtained.

Approximately 450 cy of lightly TCE contaminated (less than 2 ppm) soil as outlined in the original PLAN as Areas 2 and 3 will be excavated and spread in a four-inch layer in an area on the east side of the property as outlined in Figure 1A. This soil will be allowed to aerate for a period upto one week prior to placement back in the excavated areas.

Monitoring During Excavation

During excavation a portable organic vapor meter (OVM) will be utilized to determine if additional soils will require transport to a Class 1 facility. In addition, background air and soil readings will be obtained with the OVM to determine if the work is affecting the air quality in the vicinity of the excavation. Should levels of volatiles increase above ambient air quality, then excavation will cease until levels have dropped.

Organic Vapor Sampling

Approximately 30 soil samples in the vicinity of the 3,000 s.f. area to be excavated has been tested both analytically (USEPA 601 and 602 scans) as well as by OVM (see Original Plan). Based on these results it is estimated that the volume of soils to be excavated and trucked from the site contain approximately a maximum 0.5 gallons of TCE.

It should be noted that no vapor problems were reported during previous efforts which removed the majority of contaminated soils from the facility during the summer of 1984. Recent OVM readings at the location to be excavated indicated no detectable elevation in the ambient air levels derived from the soils on the site.

Excavation and Transportation

Excavation and loading into trucks for off-site disposal will be accomplished utilizing a front-end and skip loader. Excavation will not be conducted on days when the SCAQMD forecasts 1st, 2nd or 3rd stage episodes for the area where the excavation will occur. Excavation will not be conducted on days when the wind velocity is greater than 15 mph average or 25 mph gusts. Trucks will be provided with plastic box liners to encapsulate the soil. An impermeable tie-down tarpaulin will also be required for each truck leaving the site. It is estimated that only three truckloads will be required to transport materials from the site.

Monitoring and Control of Soil Spreading

During spreading of soils to be aerated, the OVM will be utilized to monitor any changes in ambient air quality. Based on previous soils analyses the estimated maximum possible volume of TCE contained within the 450 cy of soils to be aerated is approximately 0.2 gallons. No changes in vapor readings should, therefore, be detectable at the aeration area. Should elevated levels be determined, the rate of transport and spreading can be slowed. Inasmuch as the materials to be excavated and spread generally consist of moist medium to coarse sands, dust problems also are not anticipated. However, should dust or windblown particulates present a problem during spreading, a light application of water utilizing spray hoses will be accomplished. This method of dust control will be minimized to a misting operation in order to prevent leaching of TCE from the sand.

Agreement to Cease Operation

The owner agrees that excavation and spreading operations will be immediately ceased, if he has been informed by the Executive Officer of SCAQMD that a public nuisance has occurred.

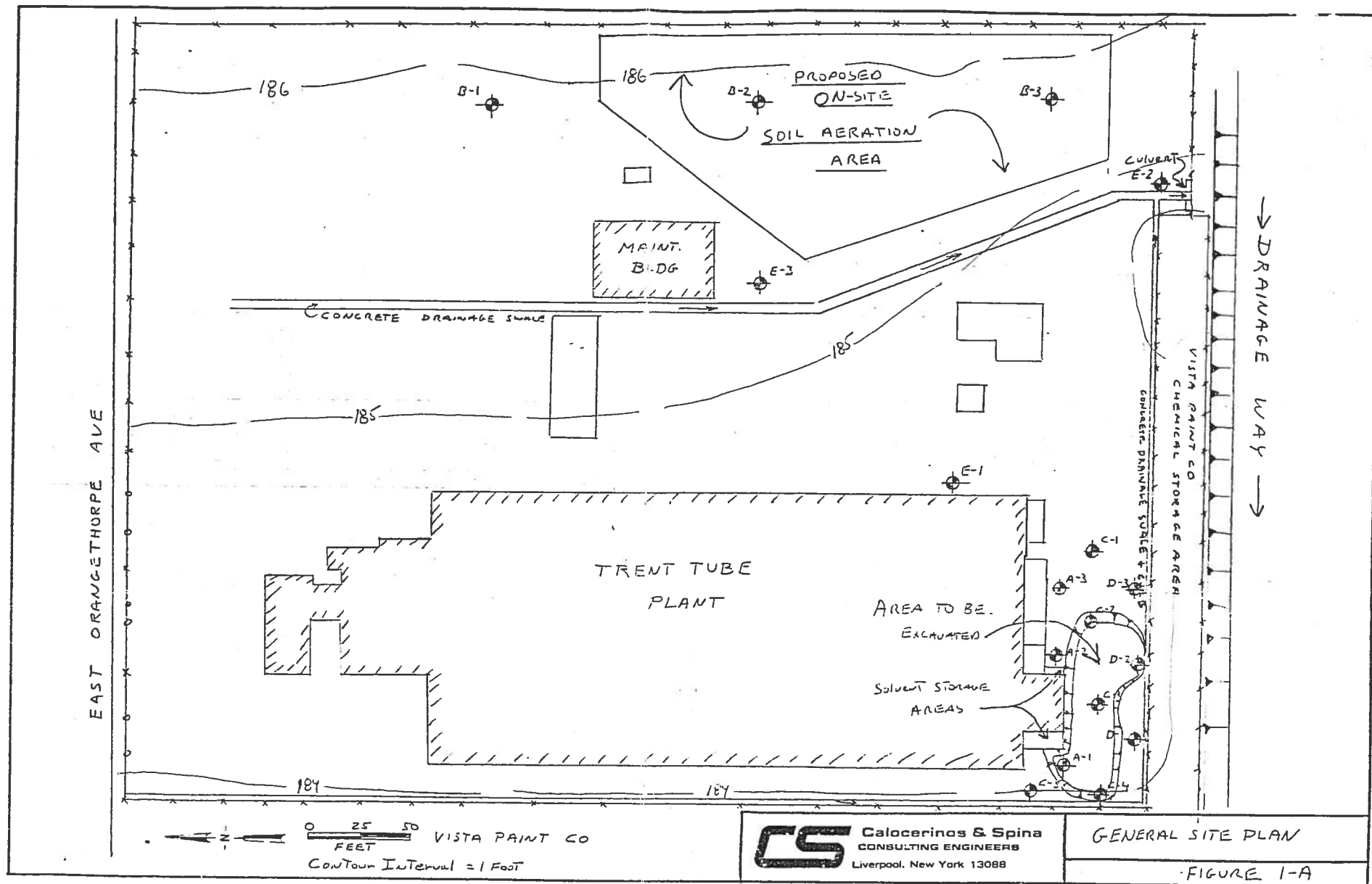
Contingent Plans

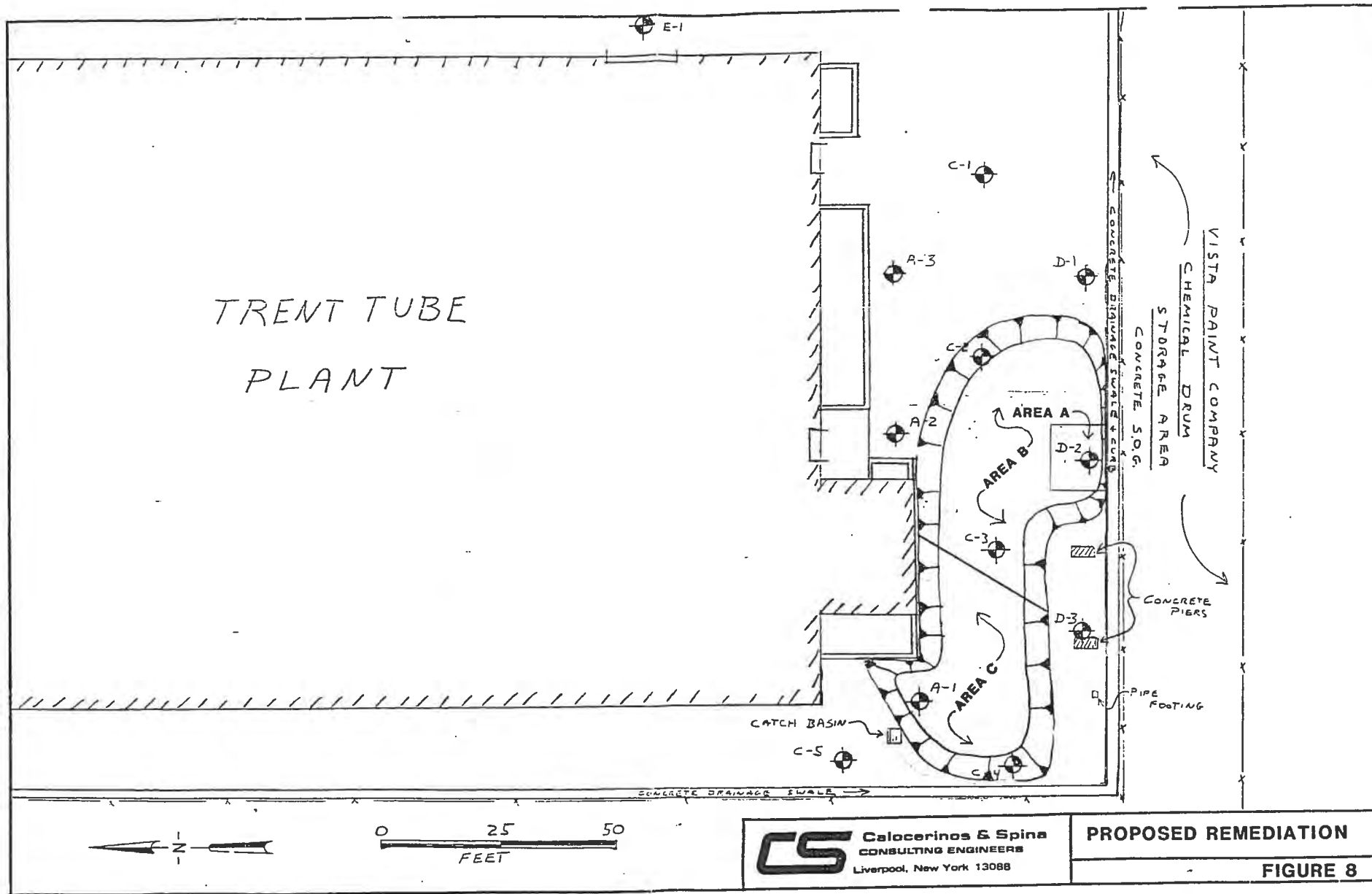
Should the aeration of the soils prove to be the sole source of public nuisance, it is proposed that those soils to be aerated will be removed from the site to a Class II-1 facility in the same manner as the soils removed to the Class I facility.

Respectfully submitted,

TRENT TUBE DIVISION

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PROPOSED REMEDIATION
FIGURE 8